

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

IN RE: Case No. 20-51066-mar

HENRY FORD VILLAGE, INC., Chapter 11

Debtor. Honorable Mark A. Randon

**Objection Deadline: December 28, 2021**

---

**TWELFTH MONTHLY FEE STATEMENT OF PERKINS COIE LLP  
FOR COMPENSATION FOR SERVICES AND REIMBURSEMENT OF EXPENSES AS  
COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
FOR THE PERIOD OF NOVEMBER 1, 2021, THROUGH NOVEMBER 30, 2021**

---

Pursuant to the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals (the “**Interim Compensation Order**”) (Docket No. 212), Perkins Coie LLP (“**Perkins Coie**”), as counsel to the Official Committee of Unsecured Creditors (the “**Committee**”), hereby submits its Twelfth Monthly Fee Statement for Allowance and Payment of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred (the “**Fee Statement**”) for the period of November 1, 2021, through November 30, 2021 (the “**Fee Statement Period**”).

Notice of this Fee Statement shall be served in accordance with the Interim Compensation Order, and objections to the relief requested herein shall be addressed in accordance with the Interim Compensation Order.

In support of this Fee Statement, (i) a summary of fees and expenses by category is attached hereto as **Exhibit A**; (ii) a summary of fees by timekeeper is

attached hereto as **Exhibit B**; and (iii) detailed invoices are attached hereto as **Exhibit C**.

As summarized below, Perkins Coie requests payment of 80% of its fees and 100% of expenses incurred during the Fee Statement Period.

### **FEE STATEMENT SUMMARY**

<b>Name of Applicant:</b>	Perkins Coie LLP
<b>Authorized to Provide Professional Services to:</b>	The Official Committee of Unsecured Creditors
<b>Date of Order Approving Retention:</b>	December 14, 2020 (effective as of November 4, 2020, Docket No. 155)
<b>Fee Statement Period:</b>	November 1, 2021 - November 30, 2021
<b>Amount of Compensation sought as actual, reasonable and necessary:</b>	\$ 45,797.72 <sup>1</sup>
<b>80% of Requested Compensation:</b>	\$ 36,638.18
<b>Expense Reimbursement sought as actual, reasonable and necessary:</b>	\$ 0.00

This is a(n):      Monthly ☒      Interim ☐      Final Application ☐

---

<sup>1</sup> This amount reflects the 17% reduction Perkins Coie has applied to its fees in this Chapter 11 case, as indicated in the *Application for Entry of an Order Authorizing Employment and Retention of Perkins Coie LLP as Lead Counsel to the Official Committee of Unsecured Creditors* (see Docket No. 88).

Dated: December 7, 2021

Respectfully submitted,

**The Official Committee of Unsecured  
Creditors for Henry Ford Village, Inc.,**

By: /s/ Eric E. Walker

PERKINS COIE LLP

ERIC E. WALKER

KATHLEEN ALLARE

131 SOUTH DEARBORN STREET

SUITE 1700

CHICAGO, ILLINOIS 60603-5559

[EWALKER@PERKINSCOIE.COM](mailto:EWALKER@PERKINSCOIE.COM)

[KALLARE@PERKINSCOIE.COM](mailto:KALLARE@PERKINSCOIE.COM)

TELEPHONE: (312) 324-8400

FACSIMILE: (312) 324-9400

*Lead Counsel to the Official Committee  
of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

IN RE: Case No. 20-51066-mar

HENRY FORD VILLAGE, INC., Chapter 11

Debtor. Honorable Mark A. Randon

**Objection Deadline: December 28, 2021**

---

**CERTIFICATE OF SERVICE**

The undersigned attorney certifies that on December 7, 2021, he caused a true and correct copy of the Twelfth Monthly Fee Statement of Perkins Coie LLP for Compensation and Reimbursement of Expenses as Counsel to the Official Committee of Unsecured Creditors from November 1, 2021, through November 30, 2021, to be served via electronic mail on the individuals so identified on the below Service List.

/s/ Eric E. Walker  
Eric E. Walker

## SERVICE LIST

SHERYL L. TOBY, ESQ.  
JONG-JU CHANG, ESQ.  
DYKEMA GOSSETT PLLC  
39577 WOODWARD AVENUE  
SUITE 300  
BLOOMFIELD HILLS, MI 48304  
[STOBY@DYKEMA.COM](mailto:STOBY@DYKEMA.COM)  
[JCHANG@DYKEMA.COM](mailto:JCHANG@DYKEMA.COM)

PAUL R. HAGE  
JAFFE RAITT HEUER & WEISS, PC  
27777 FRANKLIN ROAD  
SUITE 2500  
SOUTHFIELD, MI 48034  
[PHAGE@JAFFELAW.COM](mailto:PHAGE@JAFFELAW.COM)

LESLIE BERG  
U.S. DEPARTMENT OF JUSTICE  
OFFICE OF THE U.S. TRUSTEE FOR THE  
EASTERN DISTRICT OF MICHIGAN  
211 WEST FORT STREET, SUITE 700  
DETROIT, MI 48226  
[LESLIE.K.BERG@USDOJ.GOV](mailto:LESLIE.K.BERG@USDOJ.GOV)

PATRICK L. HUFFSTICKLER, ESQ.  
DANIELLE N. RUSHING, ESQ.  
DYKEMA GOSSETT PLLC  
112 EAST PECAN STREET, SUITE 1800  
SAN ANTONIO, TX 78205  
[PHUFFSTICKLER@DYKEMA.COM](mailto:PHUFFSTICKLER@DYKEMA.COM)  
[DRUSHING@DYKEMA.COM](mailto:DRUSHING@DYKEMA.COM)

ERIC R. BLYTHE  
DANIEL S. BLECK  
MINTZ, LEVIN, COHN, FERRIS, GLOVSKY  
AND POPEO, PC  
ONE FINANCIAL CENTER  
BOSTON, MA 02111  
[ERBLYTHE@MINTZ.COM](mailto:ERBLYTHE@MINTZ.COM)  
[DSBLECK@MINTZ.COM](mailto:DSBLECK@MINTZ.COM)

BILL BURDETT  
HOWARD & HOWARD ATTORNEYS PLLC  
450 WEST TWELFTH STREET  
ROYAL OAK, MI 48067  
[BBURDETT@HOWARDANDHOWARD.COM](mailto:BBURDETT@HOWARDANDHOWARD.COM)

**EXHIBIT A**  
*Summary of Fees by Category*

**EXHIBIT A**

**Summary of Fees by Category for  
Twelfth Monthly Fee Statement of Perkins Coie LLP**

<b>Billing Code / Category</b>	<b>Hours</b>	<b>Fees</b>	<b>Fees (-17%)</b>
141183.0001.0001 / Case Administration	0.50	\$150.00	\$124.50
141183.0001.0003 / Committee Meetings & Communications	0.70	\$626.50	\$519.99
141183.0001.0004 / Communication with Creditor Constituents	25.40	\$17,795.00	\$14,769.85
141183.0001.0005 / Retention & Fee Applications	2.70	\$988.50	\$820.45
141183.0001.0006 / Business Operations	1.20	\$1,074.00	\$891.42
141183.0001.0010 / Avoidance Action Analysis	8.10	\$5,014.50	\$4,162.03
141183.0001.0011 / Plan & Disclosure Statement	13.10	\$11,049.50	\$9,171.08
141183.0001.0012 / Claims Administration & Objections	27.30	\$18,480.00	\$15,338.40
<b>Sub-Total:</b>	<b>79.00</b>	<b>\$55,178.00</b>	<b>\$45,797.72</b>
141183.0001 - Reimbursable Costs and Expenses			<b>\$0.00</b>
<b>Sub-Total:</b>			<b>\$0.00</b>
<b>Grand Total:</b>			<b>\$45,797.72</b>

## **EXHIBIT B**

### *Summary of Fees by Timekeeper*



## EXHIBIT B

### Summary of Fees by Timekeeper for Twelfth Monthly Fee Statement of Perkins Coie LLP

Name	Title	Practice Group	Hourly Rate	Hours	Fees	Fees (-17%)
Eric E. Walker	Partner	Bankruptcy & Restructuring	\$895.00	31.30	\$28,013.50	\$23,251.21
Kathleen Allare	Associate	Bankruptcy & Restructuring	\$625.00	38.50	\$24,062.50	\$19,971.88
Hailey Varner	Associate	Bankruptcy & Restructuring	\$585.00	1.20	\$702.00	\$582.64
Rachel A. Leibowitz	Paralegal	Bankruptcy & Restructuring	\$300.00	8.00	\$2,400.00	\$1,992.00
				79.00	\$55,178.00	<b>\$45,797.72</b>

**EXHIBIT C**  
*Invoices*

1201 Third Avenue, Suite 4900  
Seattle, Washington 98101  
Phone: 206.359.8000

Email: [clientacct@perkinscoie.com](mailto:clientacct@perkinscoie.com)  
Accounting: 206.359.3143  
Fax: 206.359.9000

PERKINScoie

Henry Ford Village, Inc. - Official Committee of Unsecured Creditors  
Attn: Eric Walker  
131 S. Dearborn St.  
Suite 1700  
Chicago, IL 60603

Invoice No. 6515020  
Matter No. 141183.0001.0001  
Bill Date December 6, 2021  
Due Date Due Upon Receipt

### INVOICE SUMMARY

**Re: 141183.0001.0001 / Case Administration**

For Professional Services rendered through November 30, 2021

Services	\$150.00
Less (17.00)% Discount	(\$25.50)
Total Services	\$124.50
<b>Total Invoice Amount</b>	<b>\$124.50</b>
Previous Balance Due	\$18,690.98
<b>Total Due This Invoice</b>	<b>\$18,815.48</b>

*INFORMATION MAY BE SUBJECT TO CLIENT ATTORNEY AND/OR ATTORNEY WORK PRODUCT PRIVILEGE*

### REMITTANCE INSTRUCTIONS

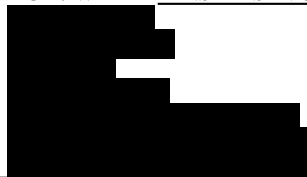
Payment Due in US Currency  
Tax Identification Number.: 91-0591206

Please identify your payment with the following: Perkins Coie Account No. 141183 and Invoice 6515020

**CHECKS:**

Perkins Coie LLP  
Attn: Client Accounting  
PO Box 24643  
Seattle, WA 98124-0643

**ACH / WIRE TRANSFERS IN USD:**



Client Privacy Policy. We collect or receive information in the ordinary course of providing legal services to you, including personal information. For more information about how we collect, use, and disclose personal information in connection with our legal representation of clients, please review our Client Privacy Policy, which can be accessed here: <https://www.perkinscoie.com/en/client-privacy-policy.html>.

After 30 days, a monthly late charge of 1% per month from the invoice date (or such lower rate as required by applicable law) will be due. Should a collection action or proceeding be necessary, attorneys' fees and costs for such collection effort will also be due.

**Professional Services through 11/30/2021**

<b>Date</b>	<b>Attorney / Assistant</b>	<b>Description of Service</b>	<b>Hours</b>
11/22/2021	R. Leibowitz	Review amended schedules filed and summarize same, per E. Walker's request;	0.30
11/29/2021	R. Leibowitz	Pull plan and disclosure statement per E. Walker's request and ascertain deadline to respond to LLS claim rejection;	0.20
<b>Total</b>			<b>0.50</b>

**Services**  
\$150.00

**Less (17.00)% Discount**  
(\$25.50)

**Total Services**  
\$124.50

**Summary of Services through 11/30/2021**

<b>Attorney / Assistant</b>	<b>Title</b>	<b>Billed Hours</b>	<b>Billed Rate</b>	<b>Billed Amount</b>
R. Leibowitz	Paralegal	0.50	300.00	150.00
<b>Total Services</b>		<b>0.50</b>		<b>\$150.00</b>

**Total Invoice Amount**  
\$124.50

1201 Third Avenue, Suite 4900  
Seattle, Washington 98101  
Phone: 206.359.8000

Email: [clientacct@perkinscoie.com](mailto:clientacct@perkinscoie.com)  
Accounting: 206.359.3143  
Fax: 206.359.9000

PERKINScoie

Henry Ford Village, Inc. - Official Committee of Unsecured Creditors  
Attn: Eric Walker  
131 S. Dearborn St.  
Suite 1700  
Chicago, IL 60603

Invoice No. 6514710  
Matter No. 141183.0001.0003  
Bill Date December 6, 2021  
Due Date Due Upon Receipt

### INVOICE SUMMARY

**Re: 141183.0001.0003 / Committee Meetings & Communications**

For Professional Services rendered through November 30, 2021

Services	\$626.50
Less (17.00)% Discount	(\$106.51)
Total Services	\$519.99
<b>Total Invoice Amount</b>	<b>\$519.99</b>
Previous Balance Due	\$24,490.73
<b>Total Due This Invoice</b>	<b>\$25,010.72</b>

*INFORMATION MAY BE SUBJECT TO CLIENT ATTORNEY AND/OR ATTORNEY WORK PRODUCT PRIVILEGE*

### REMITTANCE INSTRUCTIONS

Payment Due in US Currency  
Tax Identification Number.: 91-0591206

Please identify your payment with the following: Perkins Coie Account No. 141183 and Invoice 6514710

**CHECKS:**

Perkins Coie LLP  
Attn: Client Accounting  
PO Box 24643  
Seattle, WA 98124-0643

**ACH / WIRE TRANSFERS IN USD:**



Client Privacy Policy. We collect or receive information in the ordinary course of providing legal services to you, including personal information. For more information about how we collect, use, and disclose personal information in connection with our legal representation of clients, please review our Client Privacy Policy, which can be accessed here: <https://www.perkinscoie.com/en/client-privacy-policy.html>.

After 30 days, a monthly late charge of 1% per month from the invoice date (or such lower rate as required by applicable law) will be due. Should a collection action or proceeding be necessary, attorneys' fees and costs for such collection effort will also be due.

Invoice No. 6514710  
Henry Ford Village-Creditors' Committee  
141183.0001.0003 / Committee Meetings & Communications

PERKINScoie

**Professional Services through 11/30/2021**

Date	Attorney / Assistant	Description of Service	Hours
11/09/2021	E. Walker	Draft detailed summary of status of chapter 11 plan, voting, claim objection and liquidating trust issues for Committee;	0.70
<b>Total</b>			<b>0.70</b>

**Services**  
\$626.50

**Less (17.00)% Discount**  
(\$106.51)

**Total Services**  
\$519.99

**Summary of Services through 11/30/2021**

Attorney / Assistant	Title	Billed Hours	Billed Rate	Billed Amount
E. Walker	Partner	0.70	895.00	626.50
<b>Total Services</b>		<b>0.70</b>		<b>\$626.50</b>

**Total Invoice Amount**  
\$519.99

1201 Third Avenue, Suite 4900  
Seattle, Washington 98101  
Phone: 206.359.8000

Email: [clientacct@perkinscoie.com](mailto:clientacct@perkinscoie.com)  
Accounting: 206.359.3143  
Fax: 206.359.9000

PERKINScoie

Henry Ford Village, Inc. - Official Committee of Unsecured Creditors  
Attn: Eric Walker  
131 S. Dearborn St.  
Suite 1700  
Chicago, IL 60603

Invoice No. 6515021  
Matter No. 141183.0001.0004  
Bill Date December 6, 2021  
Due Date Due Upon Receipt

### INVOICE SUMMARY

**Re: 141183.0001.0004 / Communication with Creditor Constituents**

For Professional Services rendered through November 30, 2021

Services	\$17,795.00
Less (17.00)% Discount	(\$3,025.15)
Total Services	<u>\$14,769.85</u>
<b>Total Invoice Amount</b>	<b><u>\$14,769.85</u></b>
Previous Balance Due	<u>\$19,681.06</u>
<b>Total Due This Invoice</b>	<b><u>\$34,450.91</u></b>

*INFORMATION MAY BE SUBJECT TO CLIENT ATTORNEY AND/OR ATTORNEY WORK PRODUCT PRIVILEGE*

### REMITTANCE INSTRUCTIONS

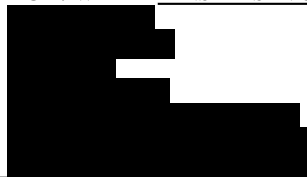
Payment Due in US Currency  
Tax Identification Number.: 91-0591206

Please identify your payment with the following: Perkins Coie Account No. 141183 and Invoice 6515021

**CHECKS:**

Perkins Coie LLP  
Attn: Client Accounting  
PO Box 24643  
Seattle, WA 98124-0643

**ACH / WIRE TRANSFERS IN USD:**



Client Privacy Policy. We collect or receive information in the ordinary course of providing legal services to you, including personal information. For more information about how we collect, use, and disclose personal information in connection with our legal representation of clients, please review our Client Privacy Policy, which can be accessed here: <https://www.perkinscoie.com/en/client-privacy-policy.html>.

After 30 days, a monthly late charge of 1% per month from the invoice date (or such lower rate as required by applicable law) will be due. Should a collection action or proceeding be necessary, attorneys' fees and costs for such collection effort will also be due.

**Professional Services through 11/30/2021**

<b>Date</b>	<b>Attorney / Assistant</b>	<b>Description of Service</b>	<b>Hours</b>
11/01/2021	E. Walker	Various telephone conferences with creditors regarding chapter 11 plan and voting procedures;	1.50
11/01/2021	K. Allare	Communications with KCC regarding creditor questions, proof of claims (.6); answer creditor questions regarding voting (.9);	1.50
11/02/2021	E. Walker	Various telephone conference with creditors regarding chapter 11 plan and voting procedures;	1.00
11/02/2021	K. Allare	Call with A. Estrada (KCC) regarding ballot issue (.2);	0.20
11/02/2021	K. Allare	Return calls to creditors regarding solicitation package (.9); answer emails from creditors regarding solicitation package (.5); follow up correspondence with KCC voting questions (.3)	1.70
11/03/2021	E. Walker	Various telephone conferences with creditors regarding chapter 11 plan and voting procedures;	1.30
11/03/2021	K. Allare	Return calls to creditors regarding voting, solicitation package (1.2); follow up correspondence with KCC regarding creditor questions (.3); correspondence with creditors (.3);	1.80
11/04/2021	E. Walker	Respond to various creditor inquiries regarding proposed chapter 11 plan and voting procedure;	0.40
11/04/2021	K. Allare	Return creditor phone calls (.8);	0.80
11/05/2021	E. Walker	Respond to various creditor inquiries regarding proposed chapter 11 plan and voting procedure;	1.30
11/05/2021	R. Leibowitz	Research and address questions from creditor per E. Walker's request;	0.60
11/05/2021	K. Allare	Return phone calls to creditors regarding DS and voting (.7);	0.70
11/09/2021	E. Walker	Various correspondences with creditors regarding chapter 11 plan and voting;	0.30
11/10/2021	E. Walker	Respond to resident inquiries regarding chapter 11 plan treatment and voting (.7); various telephone conferences with creditors regarding chapter 11 plan and voting (.8);	1.50
11/10/2021	K. Allare	Return phone calls to entrance fee creditors (.6);	0.60
11/11/2021	K. Allare	Correspondence with creditors regarding general bankruptcy questions (.8); return calls (.8);	1.60
11/12/2021	K. Allare	Answer creditor questions regarding notices (.7);	0.70
11/15/2021	E. Walker	Telephone conference with creditor regarding plan treatment and voting;	0.30
11/17/2021	E. Walker	Correspondence with creditor regarding chapter 11 plan treatment and voting (.3);	0.30



Date	Attorney / Assistant	Description of Service	Hours
11/17/2021	K. Allare	Return calls regarding voting on plan (.3);	0.30
11/19/2021	R. Leibowitz	Correspondence with various creditors to assist with submission of ballots and review of solicitation materials, per E. Walker's requests (.8); correspond with claims administrator and submit ballot via overnight mail per instructions (.4);	1.20
11/19/2021	K. Allare	Return phone calls to creditors (1.0);	1.00
11/22/2021	R. Leibowitz	Follow up with claims administrator regarding creditor voting;	0.60
11/22/2021	K. Allare	Calls, correspondence with creditors regarding voting questions (1.0);	1.00
11/24/2021	E. Walker	Various correspondence and telephone conference with creditors regarding chapter 11 plan and voting;	1.30
11/24/2021	K. Allare	Answer questions regarding voting (.9);	0.90
11/26/2021	E. Walker	Various correspondence and telephone conference with creditors regarding plan voting;	0.80
11/26/2021	K. Allare	Call with creditor regarding voting, treatment of claim (.2);	0.20
<b>Total</b>			<b>25.40</b>

**Services**

\$17,795.00

**Less (17.00)% Discount**

(\$3,025.15)

**Total Services**

\$14,769.85

**Summary of Services through 11/30/2021**

Attorney / Assistant	Title	Billed Hours	Billed Rate	Billed Amount
E. Walker	Partner	10.00	895.00	8,950.00
K. Allare	Associate	13.00	625.00	8,125.00
R. Leibowitz	Paralegal	2.40	300.00	720.00
<b>Total Services</b>		<b>25.40</b>		<b>\$17,795.00</b>

**Total Invoice Amount**

\$14,769.85

1201 Third Avenue, Suite 4900  
Seattle, Washington 98101  
Phone: 206.359.8000

Email: [clientacct@perkinscoie.com](mailto:clientacct@perkinscoie.com)  
Accounting: 206.359.3143  
Fax: 206.359.9000

PERKINScoie

Henry Ford Village, Inc. - Official Committee of Unsecured Creditors  
Attn: Eric Walker  
131 S. Dearborn St.  
Suite 1700  
Chicago, IL 60603

Invoice No. 6514708  
Matter No. 141183.0001.0005  
Bill Date December 6, 2021  
Due Date Due Upon Receipt

### INVOICE SUMMARY

**Re: 141183.0001.0005 / Retention & Fee Applications**

For Professional Services rendered through November 30, 2021

Services	\$988.50
Less (17.00)% Discount	(\$168.05)
Total Services	\$820.45
<b>Total Invoice Amount</b>	<b>\$820.45</b>
Previous Balance Due	\$19,517.53
<b>Total Due This Invoice</b>	<b>\$20,337.98</b>

*INFORMATION MAY BE SUBJECT TO CLIENT ATTORNEY AND/OR ATTORNEY WORK PRODUCT PRIVILEGE*

### REMITTANCE INSTRUCTIONS

Payment Due in US Currency  
Tax Identification Number.: 91-0591206

Please identify your payment with the following: Perkins Coie Account No. 141183 and Invoice 6514708

**CHECKS:**

Perkins Coie LLP  
Attn: Client Accounting  
PO Box 24643  
Seattle, WA 98124-0643

**ACH / WIRE TRANSFERS IN USD:**



Client Privacy Policy. We collect or receive information in the ordinary course of providing legal services to you, including personal information. For more information about how we collect, use, and disclose personal information in connection with our legal representation of clients, please review our Client Privacy Policy, which can be accessed here: <https://www.perkinscoie.com/en/client-privacy-policy.html>.

After 30 days, a monthly late charge of 1% per month from the invoice date (or such lower rate as required by applicable law) will be due. Should a collection action or proceeding be necessary, attorneys' fees and costs for such collection effort will also be due.

**Professional Services through 11/30/2021**

Date	Attorney / Assistant	Description of Service	Hours
11/11/2021	E. Walker	Review and revise exhibits for monthly fee statement;	0.30
11/17/2021	R. Leibowitz	Review prior fee statement to address inquiry from accounting department;	0.30
11/18/2021	R. Leibowitz	Review invoices, prepare coversheets and exhibits to 10th and 11th monthly fee statements of Perkins Coie, for billing from September and October 2021, respectively, and submit same for review and approval;	1.80
11/18/2021	R. Leibowitz	Conference with B. Burdett regarding Howard and Howard August and September billing and follow-up with E. Walker to address question from FTI regarding same;	0.30
<b>Total</b>			<b>2.70</b>

**Services**  
\$988.50

**Less (17.00)% Discount**  
(\$168.05)

**Total Services**  
\$820.45

**Summary of Services through 11/30/2021**

Attorney / Assistant	Title	Billed Hours	Billed Rate	Billed Amount
E. Walker	Partner	0.30	895.00	268.50
R. Leibowitz	Paralegal	2.40	300.00	720.00
<b>Total Services</b>		<b>2.70</b>		<b>\$988.50</b>

**Total Invoice Amount**  
\$820.45

1201 Third Avenue, Suite 4900  
Seattle, Washington 98101  
Phone: 206.359.8000

Email: [clientacct@perkinscoie.com](mailto:clientacct@perkinscoie.com)  
Accounting: 206.359.3143  
Fax: 206.359.9000

PERKINScoie

Henry Ford Village, Inc. - Official Committee of Unsecured Creditors  
Attn: Eric Walker  
131 S. Dearborn St.  
Suite 1700  
Chicago, IL 60603

Invoice No. 6514707  
Matter No. 141183.0001.0006  
Bill Date December 6, 2021  
Due Date Due Upon Receipt

### INVOICE SUMMARY

**Re: 141183.0001.0006 / Business Operations**

For Professional Services rendered through November 30, 2021

Services	\$1,074.00
Less (17.00)% Discount	(\$182.58)
Total Services	\$891.42
<b>Total Invoice Amount</b>	<b>\$891.42</b>
Previous Balance Due	\$7,662.05
<b>Total Due This Invoice</b>	<b>\$8,553.47</b>

*INFORMATION MAY BE SUBJECT TO CLIENT ATTORNEY AND/OR ATTORNEY WORK PRODUCT PRIVILEGE*

### REMITTANCE INSTRUCTIONS

Payment Due in US Currency  
Tax Identification Number.: 91-0591206

Please identify your payment with the following: Perkins Coie Account No. 141183 and Invoice 6514707

**CHECKS:**

Perkins Coie LLP  
Attn: Client Accounting  
PO Box 24643  
Seattle, WA 98124-0643

**ACH / WIRE TRANSFERS IN USD:**



Client Privacy Policy. We collect or receive information in the ordinary course of providing legal services to you, including personal information. For more information about how we collect, use, and disclose personal information in connection with our legal representation of clients, please review our Client Privacy Policy, which can be accessed here: <https://www.perkinscoie.com/en/client-privacy-policy.html>.

After 30 days, a monthly late charge of 1% per month from the invoice date (or such lower rate as required by applicable law) will be due. Should a collection action or proceeding be necessary, attorneys' fees and costs for such collection effort will also be due.

**Professional Services through 11/30/2021**

<b>Date</b>	<b>Attorney / Assistant</b>	<b>Description of Service</b>	<b>Hours</b>
11/02/2021	E. Walker	Correspondence with Debtor regarding filing claim under D&O policy;	0.30
11/08/2021	E. Walker	Review correspondence from insurance carrier to notice of circumstance (.3); correspondence regarding next steps (.1);	0.40
11/10/2021	E. Walker	Correspondence regarding insurance coverage correspondence and next steps;	0.50
<b>Total</b>			<b>1.20</b>

**Services**  
\$1,074.00

**Less (17.00)% Discount**  
(\$182.58)

**Total Services**  
\$891.42

**Summary of Services through 11/30/2021**

<b>Attorney / Assistant</b>	<b>Title</b>	<b>Billed Hours</b>	<b>Billed Rate</b>	<b>Billed Amount</b>
E. Walker	Partner	1.20	895.00	1,074.00
<b>Total Services</b>		<b>1.20</b>		<b>\$1,074.00</b>

**Total Invoice Amount**  
\$891.42

1201 Third Avenue, Suite 4900  
Seattle, Washington 98101  
Phone: 206.359.8000

Email: [clientacct@perkinscoie.com](mailto:clientacct@perkinscoie.com)  
Accounting: 206.359.3143  
Fax: 206.359.9000

PERKINScoie

Henry Ford Village, Inc. - Official Committee of Unsecured Creditors  
Attn: Eric Walker  
131 S. Dearborn St.  
Suite 1700  
Chicago, IL 60603

Invoice No. 6514890  
Matter No. 141183.0001.0010  
Bill Date December 6, 2021  
Due Date Due Upon Receipt

### INVOICE SUMMARY

**Re: 141183.0001.0010 / Avoidance Action Analysis**

For Professional Services rendered through November 30, 2021

Services	\$5,014.50
Less (17.00)% Discount	(\$852.47)
Total Services	\$4,162.03
<b>Total Invoice Amount</b>	<b>\$4,162.03</b>
Previous Balance Due	\$24,177.51
<b>Total Due This Invoice</b>	<b>\$28,339.54</b>

*INFORMATION MAY BE SUBJECT TO CLIENT ATTORNEY AND/OR ATTORNEY WORK PRODUCT PRIVILEGE*

### REMITTANCE INSTRUCTIONS

Payment Due in US Currency  
Tax Identification Number.: 91-0591206

Please identify your payment with the following: Perkins Coie Account No. 141183 and Invoice 6514890

#### CHECKS:

Perkins Coie LLP  
Attn: Client Accounting  
PO Box 24643  
Seattle, WA 98124-0643

#### ACH / WIRE TRANSFERS IN USD:



Client Privacy Policy. We collect or receive information in the ordinary course of providing legal services to you, including personal information. For more information about how we collect, use, and disclose personal information in connection with our legal representation of clients, please review our Client Privacy Policy, which can be accessed here: <https://www.perkinscoie.com/en/client-privacy-policy.html>.

After 30 days, a monthly late charge of 1% per month from the invoice date (or such lower rate as required by applicable law) will be due. Should a collection action or proceeding be necessary, attorneys' fees and costs for such collection effort will also be due.

**Professional Services through 11/30/2021**

<b>Date</b>	<b>Attorney / Assistant</b>	<b>Description of Service</b>	<b>Hours</b>
11/02/2021	K. Allare	Analyze potential payments for claw back (.7); outline, revise memo (2.1);	2.80
11/02/2021	H. Varner	Conduct legal research regarding fraudulent transfer law within the Sixth Circuit (0.8); continue working on memorandum regarding same (0.4);	1.20
11/05/2021	K. Allare	Draft preference analysis (2.3)	2.30
11/11/2021	K. Allare	Draft preference analysis memo (1.8);	1.80
<b>Total</b>			<b>8.10</b>

**Services**  
\$5,014.50

**Less (17.00)% Discount**  
(\$852.47)

**Total Services**  
\$4,162.03

**Summary of Services through 11/30/2021**

<b>Attorney / Assistant</b>	<b>Title</b>	<b>Billed Hours</b>	<b>Billed Rate</b>	<b>Billed Amount</b>
H. Varner	Associate	1.20	585.00	702.00
K. Allare	Associate	6.90	625.00	4,312.50
<b>Total Services</b>		<b>8.10</b>		<b>\$5,014.50</b>

**Total Invoice Amount**  
\$4,162.03

1201 Third Avenue, Suite 4900  
Seattle, Washington 98101  
Phone: 206.359.8000

Email: [clientacct@perkinscoie.com](mailto:clientacct@perkinscoie.com)  
Accounting: 206.359.3143  
Fax: 206.359.9000

PERKINScoie

Henry Ford Village, Inc. - Official Committee of Unsecured Creditors  
Attn: Eric Walker  
131 S. Dearborn St.  
Suite 1700  
Chicago, IL 60603

Invoice No. 6514891  
Matter No. 141183.0001.0011  
Bill Date December 6, 2021  
Due Date Due Upon Receipt

## INVOICE SUMMARY

**Re: 141183.0001.0011 / Plan & Disclosure Statement**

For Professional Services rendered through November 30, 2021

Services	\$11,049.50
Less (17.00)% Discount	(\$1,878.42)
Total Services	\$9,171.08
<b>Total Invoice Amount</b>	<b>\$9,171.08</b>
Previous Balance Due	\$108,936.62
<b>Total Due This Invoice</b>	<b>\$118,107.70</b>

*INFORMATION MAY BE SUBJECT TO CLIENT ATTORNEY AND/OR ATTORNEY WORK PRODUCT PRIVILEGE*

## REMITTANCE INSTRUCTIONS

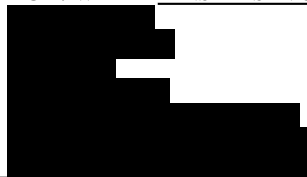
Payment Due in US Currency  
Tax Identification Number.: 91-0591206

Please identify your payment with the following: Perkins Coie Account No. 141183 and Invoice 6514891

### CHECKS:

Perkins Coie LLP  
Attn: Client Accounting  
PO Box 24643  
Seattle, WA 98124-0643

### ACH / WIRE TRANSFERS IN USD:



Client Privacy Policy. We collect or receive information in the ordinary course of providing legal services to you, including personal information. For more information about how we collect, use, and disclose personal information in connection with our legal representation of clients, please review our Client Privacy Policy, which can be accessed here: <https://www.perkinscoie.com/en/client-privacy-policy.html>.

After 30 days, a monthly late charge of 1% per month from the invoice date (or such lower rate as required by applicable law) will be due. Should a collection action or proceeding be necessary, attorneys' fees and costs for such collection effort will also be due.



**Professional Services through 11/30/2021**

<b>Date</b>	<b>Attorney / Assistant</b>	<b>Description of Service</b>	<b>Hours</b>
11/05/2021	E. Walker	Telephone conference with Debtor's counsel and CRO regarding plan confirmation issues (.3); correspondence with US Trustee regarding stipulation over transfer of charitable funds held by Debtor (.2); various correspondence regarding same (.3);	0.80
11/08/2021	K. Allare	Correspondence with KCC regarding resident voting issues (.3);	0.30
11/09/2021	E. Walker	Telephone conference with US Trustee counsel regarding status of chapter 11 plan, claim objection and proposed stipulation to disburse restricted donor funds (.5); various follow up telephone conferences and correspondences with Debtor's counsel regarding stipulation to disburse restricted donor funds (.7); review Cy Pres petition regarding same (.4); telephone conference with claims trader regarding chapter 11 plan and voting (.3);	1.90
11/11/2021	E. Walker	Telephone conference with counsel for LCS regarding proposed chapter 11 plan and claim objection (.6); analysis and telephone conference regarding same (.8); review case law relating to claim objection (1.7); correspondence with Debtor's counsel regarding status of voting on Plan (.1); correspondence regarding order on Cy Pres petition (.2);	2.60
11/12/2021	E. Walker	Correspondence regarding status of votes in support of plan (.2); various correspondences regarding same (.3);	0.50
11/16/2021	E. Walker	Correspondence with counsel for LCS regarding chapter 11 plan (.3); analysis regarding same (.5);	0.80
11/17/2021	E. Walker	Correspondence with debtor's counsel regarding plan telephone confirmation (.1); correspondence with local counsel regarding same (.2);	0.30
11/19/2021	E. Walker	Correspondence regarding status of voting on the plan (.2); correspondence with counsel for LCS regarding claim objection and chapter 11 plan (.3); review motion to temporarily allow claim under Rule 3018(a) (.5); analysis and correspondence regarding same (.5);	1.50
11/22/2021	E. Walker	Telephone conference with Debtor's counsel regarding LCS motion to allow claim for voting purposes (.5); analysis regarding same (.4);	0.90
11/23/2021	E. Walker	Telephone conference with Debtor's counsel regarding confirmation issues (.5); analysis of voting on plan (.3); review LCS objection to confirmation (.3); correspondence regarding same (.2);	1.30
11/23/2021	K. Allare	Review, comment on CRO declaration (1.0); review LCS objection to plan (.8);	1.80
11/29/2021	K. Allare	Review correspondence regarding tabulation, voting report (.4);	0.40
<b>Total</b>			<b>13.10</b>

Invoice No. 6514891  
Henry Ford Village-Creditors' Committee  
141183.0001.0011 / Plan & Disclosure Statement

PERKINScoie

**Services**  
\$11,049.50

**Less (17.00)% Discount**  
(\$1,878.42)

**Total Services**  
\$9,171.08

**Summary of Services through 11/30/2021**

<b>Attorney / Assistant</b>	<b>Title</b>	<b>Billed Hours</b>	<b>Billed Rate</b>	<b>Billed Amount</b>
E. Walker	Partner	10.60	895.00	9,487.00
K. Allare	Associate	2.50	625.00	1,562.50
<b>Total Services</b>		<b>13.10</b>		<b>\$11,049.50</b>

**Total Invoice Amount**  
\$9,171.08

1201 Third Avenue, Suite 4900  
Seattle, Washington 98101  
Phone: 206.359.8000

Email: [clientacct@perkinscoie.com](mailto:clientacct@perkinscoie.com)  
Accounting: 206.359.3143  
Fax: 206.359.9000

PERKINScoie

Henry Ford Village, Inc. - Official Committee of Unsecured Creditors  
Attn: Eric Walker  
131 S. Dearborn St.  
Suite 1700  
Chicago, IL 60603

Invoice No. 6515023  
Matter No. 141183.0001.0012  
Bill Date December 6, 2021  
Due Date Due Upon Receipt

## INVOICE SUMMARY

**Re: 141183.0001.0012 / Claims Administration & Objections**

For Professional Services rendered through November 30, 2021

Services	\$18,480.00
Less (17.00)% Discount	(\$3,141.60)
Total Services	\$15,338.40
<b>Total Invoice Amount</b>	<b>\$15,338.40</b>
Previous Balance Due	\$15,316.97
<b>Total Due This Invoice</b>	<b>\$30,655.37</b>

*INFORMATION MAY BE SUBJECT TO CLIENT ATTORNEY AND/OR ATTORNEY WORK PRODUCT PRIVILEGE*

## REMITTANCE INSTRUCTIONS

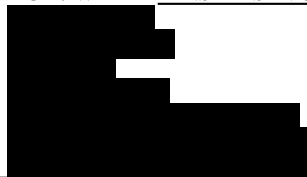
Payment Due in US Currency  
Tax Identification Number.: 91-0591206

Please identify your payment with the following: Perkins Coie Account No. 141183 and Invoice 6515023

### CHECKS:

Perkins Coie LLP  
Attn: Client Accounting  
PO Box 24643  
Seattle, WA 98124-0643

### ACH / WIRE TRANSFERS IN USD:



Client Privacy Policy. We collect or receive information in the ordinary course of providing legal services to you, including personal information. For more information about how we collect, use, and disclose personal information in connection with our legal representation of clients, please review our Client Privacy Policy, which can be accessed here: <https://www.perkinscoie.com/en/client-privacy-policy.html>.

After 30 days, a monthly late charge of 1% per month from the invoice date (or such lower rate as required by applicable law) will be due. Should a collection action or proceeding be necessary, attorneys' fees and costs for such collection effort will also be due.

**Professional Services through 11/30/2021**

Date	Attorney / Assistant	Description of Service	Hours
11/02/2021	E. Walker	Review and revise draft claims objection;	2.50
11/02/2021	K. Allare	Review comments to claims objection (.3);	0.30
11/03/2021	K. Allare	Revise claim objection (2.8); additional research on Sixth Circuit standards, Bankruptcy Rule 3003 (1.2);	4.00
11/04/2021	E. Walker	Review and revise LCS claim objection (1.8); correspondence with counsel for LCS and Debtor regarding same (.2);	2.00
11/04/2021	K. Allare	Review, revise claim objection (1.0);	1.00
11/05/2021	E. Walker	Telephone conference with Debtor's counsel and CRO regarding LCS claims and objection;	0.30
11/05/2021	R. Leibowitz	Review Federal Rule of Bankruptcy Procedure 3007 and prepare certificate of service for objection to LCS proofs of claim (.7); compile exhibit to objection (.3); finalize, file, and serve same via US Mail and email (.4);	1.40
11/05/2021	K. Allare	Revise LCS objection (.4); coordinate filing of same (.4); call with S. Toby, C. Shandler regarding same (.5)	1.30
11/08/2021	E. Walker	Review VFS motion to assume contract and Debtor objection (.6); telephone conference with Debtor's counsel regarding same (.3); prepare for and attend hearing on same (.6); various telephone conferences with Debtor's counsel regarding next steps (.7);	2.20
11/08/2021	K. Allare	Correspondence with E. Walker, local counsel regarding noticing issue (.8);	0.80
11/09/2021	E. Walker	Various correspondences regarding procedure for re-filing and noticing claim objection (.4); review legal research regarding claim objection and correspondence regarding same (.5);	0.90
11/09/2021	R. Leibowitz	Revise certificate of service, finalize and file Committee's objection to LCS's proofs of claim, serve same upon notice parties via email, and arrange for service on claimant via United States First Class Mail;	0.70
11/09/2021	R. Leibowitz	Correspond with K. Allare regarding service requirements under Bankruptcy Rules 7004 and 9006 and Federal Rule of Civil Procedure Rule 6;	0.60
11/09/2021	K. Allare	Call with E. Walker regarding LCS claim objection (.2); review MIEB court docketing rules (.2); call with B. Burdett (.3); revise claim objection (.2); research 1126(a) issue (1.7); coordinate filing of LCS claim objection (.3);	2.90
11/10/2021	E. Walker	Review correspondence regarding resolution of VFS claim (.2); review proposed stipulation and correspondence regarding same (.4);	0.60
11/11/2021	K. Allare	Follow up research regarding claim objection (2.0);	2.00
11/19/2021	K. Allare	Review response to claim objection (.8);	0.80

Invoice No. 6515023  
Henry Ford Village-Creditors' Committee  
141183.0001.0012 / Claims Administration & Objections

PERKINScoie

Date	Attorney / Assistant	Description of Service	Hours
11/29/2021	K. Allare	Drat stipulation regarding claim objection (1.0); correspondence regarding deadline for same (.3);	1.00
11/30/2021	K. Allare	Research state law contract and tort claims (2.0);	2.00
<b>Total</b>			<b>27.30</b>

**Services**  
\$18,480.00

**Less (17.00)% Discount**  
(\$3,141.60)

**Total Services**  
\$15,338.40

### Summary of Services through 11/30/2021

Attorney / Assistant	Title	Billed Hours	Billed Rate	Billed Amount
E. Walker	Partner	8.50	895.00	7,607.50
K. Allare	Associate	16.10	625.00	10,062.50
R. Leibowitz	Paralegal	2.70	300.00	810.00
<b>Total Services</b>		<b>27.30</b>		<b>\$18,480.00</b>

**Total Invoice Amount**  
\$15,338.40